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Subject:Comments on Y2K NPRM

y2krule.wpd

RFC822.TXT

August 9, 1999

Mr. Robert E. David
Airport Safety and Operations Division (AAS-300)
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 2059 1

Dear Bob:

The appropriate staff at Boston's Logan International Airport have reviewed the proposed rule for Y2K inspections and offer the following comments:

1)   The proposal specifies that tests must be conducted and results reported within one hour of the required testing deadline. With the exception of ARFF vehicles, there is no discussion of contingency plans for system failures.   Contingency plans have been developed for all high risk systems at Logan. These plans specify methods of coping with system failures and in most situations would allow for minimal impact on operations. For example, the airfield lighting computer could fail and the contingency plan for manual control of all airfield lighting would be implemented. The proposed rule should address this in relation to the reporting requirement to prevent miscommunication or misreporting of an airports' actual capabilities to handle air carrier operations in compliance with FAR 139.

2)   The proposal gives the FAA the authority to determine specific systems to be checked and to notify airport operators of this determination October 3 1, 1999. Since this identification has not yet been made, it is difficult to determine the reasonableness of our ability to conduct a thorough test within the allotted time of one hour. While we intend to begin testing immediately with all available staff, testing of all system functions requires time and expertise. It may be appropriate to perform two phase testing. The first phase would include standard operational tests performed by the system users. These tests can be accomplished quickly and will give immediate indications of major problems. The second phase would require more in depth testing conducted by the system administrator to determine less visible system malfunctions. While the first phase of operational testing of key systems will likely be accomplished within one hour, it is unlikely that the second phase could be conducted in this allotted time.

3)   Many FAA owned and operated systems are in place at airports which impact operations. In addition to the ATC operations, these include communications, lighting, and navaid systems. FAA should ensure that these systems are tested in the same timeframes as required of individual airports and the results of those tests should be promptly reported to the airport operator.

Thank you for this opportunity to comment on the proposed rule. We look forward to the final version and to working closely with the FAA to minimize the impact of Y2K on Logan Interational Airport operations.

Sincerely,

John K. Duval
Assistant Director of Operations

cc: T. Kinton   S. Sleiman
        L. Filipe   G. Tobin

J. Lawless   G. Russo